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Newman was not a purchaser for value, and therefore his prior notice to the holder of the fund did not entitle him to priority. *The Elmbank*, 72 Fed. Rep. 610.

It seems clear on principle that a creditor who takes a thing merely as security for a pre-existing debt gives no value and surrenders no right against his debtor in exchange for the new security given, and therefore that he is not a purchaser for value. Thus, one who takes personal property as security for a pre-existing debt, takes it subject to equities attached to it in the hands of the debtor. *Goodwin v. Massachusetts Loan Co.*, 152 Mass. 189, 199; *Savings Bank v. Bates*, 120 U. S. 556. It is true that, by the prevalent view, one who takes negotiable paper as security for a pre-existing debt takes it free of all equities; *Railroad Co. v. Bank*, 102 U. S. 14; but it seems clear that the cases taking this view must be supported, not on the ground that the holder is a purchaser for value, but on the ground that he has taken negotiable paper — a thing which in many respects is treated as money — in the course of a business transaction, and that he may therefore hold it free of all equities.

REVIEWS.

SELECT CASES FROM THE CORONERS' ROLLS, A.D. 1265-1413, with a Brief Account of the History of the Office of Coroner. Edited for the Selden Society, by Charles Gross, Ph.D., Assistant Professor of History, Harvard University. London, 1896.

The greatest importance of these rolls is historical and chiefly constitutional; and Professor Gross has done well in confining himself, in his excellent and scholarly introduction, to the constitutional position of the coroner, as shown by these rolls and other early authorities. There seems to have been no very close parallel elsewhere to this officer. The English coroner is a curious link between Crown and people. Elected by the people of the county or other local division, the only elective official in the county courts, coming in every case of accidental death and in many others into close relations with the people, he was essentially a popular officer, a product and a proof of local self-government; on the other hand, he was the direct means of accounting to the central government for affairs of every-day life in which it was interested, especially by overseeing the operation of the hue and cry, and by securing for the Crown its deodands and similar rights; and was a check for the King upon the sheriff, though the latter was appointed by the King. No other European nation combined a strong central power with local self-government; and it is therefore not surprising that such an officer was nowhere else found.

Professor Gross brings out clearly this peculiar position of the coroner; he speaks well also of the "four neighboring vills," which seem to have persisted until lately, if indeed they do not still form an administrative group. The Introduction is in fact a valuable essay in English constitutional history.

These rolls have in large measure a quality peculiar to all the English legal rolls; they are a remarkable witness of the common life of the English people in the Middle Ages. No other nation possesses such material for the history of its people. One cannot but be surprised, in reading these rolls, at the number of small children who fell into ditches or wells, or pots of boiling water, or were buried by falling sand-banks; and one may well marvel to find that a three-year old boy "fell into a pan full of milk, and thus was drowned by misadventure" (p. 50). The state of the prisons is vividly set forth in a series of presentments in the cases of seven men who were found to have died in the prison of the castle

of Northampton, within a little more than a year, of cold, hunger, and privation (pp. 79-81). A vivid notion of mediæval student life may be obtained from the presentments growing out of student brawls at Oxford (pp. 87-91).

But though chiefly interesting historically, these rolls, though only records of presentments, contain much of interest to the lawyer. We see here the machinery of appeal in four county courts and the operation of the hue and cry. A man who in felling a tree had accidentally killed a girl, was ordered arrested, because he had not raised the hue (p. 38). Felons abjured the realm before coroners: we have instances here where such a felon, having fled from the highway, was followed by a vill and beheaded as he ran (pp. 37, 76). A survival of a very old form of deodand is discoverable in passages where a well in which a boy had been drowned was ordered closed (p. 42), and a ditch in which a girl had been drowned was ordered filled up (p. 82.) In an interesting presentment it appeared that a man had been wounded in another county, but had died within the hundred where the inquest was held. The inquest was not able to speak of his chattels (p. 74).

This volume is, both in contents and in its editorial work, one of the most satisfactory publications of the Seldon Society. We may properly take pride in the fact that we owe it to American scholarship.

H. B.

HANDBOOK OF THE LAW OF BAILMENTS AND CARRIERS. By William B. Hale, LL.B. St. Paul: West Publishing Co. 1896. (Hornbook Series.) pp. xii, 663.

This new "Hornbook" has the same general characteristics and scope as its predecessors. Meant primarily for students, it loses no value because of the numerous citations of authorities, both English and American, while for the very same reason it is a more satisfactory reference book for the practitioner. Careful study and systematic compilation are manifested throughout the book. Every question is squarely met. Where the decisions are conflicting or unsettled, the author boldly asserts his own views, at the same time explaining the exact state of the law. It is a practical work, for it holds closely to the decisions, and does not present original theories. In fact, to originality the author does not pretend. He acknowledges careful study and frequent use of the works of Judge Story and subsequent writers on bailments and carriers. A comprehensive index has made reference easy. The new "Hornbook" is well worth the room which a lawyer can find for it on his shelves, and will be in demand among law students.

H. C. L.

A TREATISE ON THE LAW OF EMPLOYERS' LIABILITY ACTS. By Conrad Reno. Boston: Houghton, Mifflin, & Co. 1886. pp. xiv, 423.

Though Employers' Liability Acts exist in only four of our States, and two of these acts have been in force for only three years, enough cases seem to have arisen under them to justify a text-book on this practically important subject. The very numerous questions which have arisen in the interpretation of these acts, and the frequent references that must be made to the common law on the subject, although the statutory right of action is distinct from the right at common law, have given Mr. Reno